

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

PROGME CORPORATION,

Plaintiff

Civil Action No. 2:17-cv-01488-GAM

District Judge Gerald Austin McHugh

v.

COMCAST CABLE

COMMUNICATIONS, LLC,

Defendant

**PLAINTIFF'S MOTION FOR
LEAVE TO FILE FOURTH
AMENDED COMPLAINT
FOR PATENT INFRINGEMENT
OR, IN THE ALTERNATIVE,
MOTION FOR LEAVE TO FILE
VOLUNTARY DISMISSAL OF
ACTION WITHOUT
PREJUDICE PURSUANT TO
FRCP 41(a)(2)**

Progme hereby moves this Honorable Court to grant Progme leave to file the appended **FOURTH AMENDED COMPLAINT FOR PATENT INFRINGEMENT** or, in the alternative, grant Progme leave to voluntarily dismiss the action without prejudice in the above-captioned action.

November 17, 2017

Respectfully submitted,

/s/ David A. Reams

David A. Reams, *Pro Hac Vice*

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Lead Counsel for Progme Corporation

CERTIFICATE OF SERVICE

I hereby certify that on this 17th day of November, 2017, I electronically filed the foregoing paper with the Clerk of Court using the ECF system which will send notification of such filing to all counsel of record.

Signed,

/s/ David A. Reams
David A. Reams

